



Brian L. Grossman
Senior Associate

P: +1.646.357.3239
F: +1.646.776.5743
E: bgrossman@rsf-llp.com

Reinhardt Savic Foley LLP

New York
200 Liberty Street 27th Fl.
New York, New York 10281
www.rsflp.com

August 19, 2022

VIA ECF

Hon. John G. Koeltl
United States Magistrate Judge
U.S. District Court
500 Pearl Street
Courtroom 14A
New York, New York 10007

The parties should explain in more detail why the additional documents should be filed under seal. So ordered.

August 22, 2022
New York, NY

/s/ John G. Koeltl
John G. Koeltl, U.S.D.J.

Re: *Body Glove IP Holdings, LP v. Exist, Inc. et al.*, 21-cv-01181-JGK
Letter Motion Regarding Sealed Filings

Dear Judge Koeltl,


My firm represents the Defendants Exist, Inc. (“Exist”) and Joshua Glickman (“Glickman”, together with Exist, “Defendants”) in the above-referenced action initiated by Plaintiff Body Glove IP Holdings, LP (“Plaintiff” or “Body Glove”). I write pursuant to Your Honor’s Individual Practices, Rule VI(A)(2) as to Body Glove’s request that certain documents be filed under seal.

On Wednesday, August 17, 2022, I had a meet and confer with counsel for Body Glove and informed Body Glove of Defendants’ intent to file certain documents in support of summary judgment that were marked in discovery as “Attorneys’ Eyes’ Only” by Body Glove. Body Glove confirmed that it believed the documents—consisting of agreements between Body Glove and third-parties, as well as testimony regarding those agreements—should be filed under seal in this litigation and any discussion of those documents in the memorandum of law should be redacted.

On August 19, 2022, I again had a meet and confer call with counsel for Body Glove whereby Body Glove took the position that several other documents produced by Body Glove should also be filed under seal. Defendants take no position as to whether the sealing of these documents is appropriate but Defendants have filed these documents under seal pursuant to Body Glove’s request.

Body Glove is aware of Your Honor’s Individual Practices, Rule VI(A)(2), that requires Body Glove—as the party requesting these agreements and related testimony be filed under seal—“must file, within three days, a letter explaining the need to seal or redact the materials.”

Respectfully submitted,



Brian L. Grossman

Encls: Unredacted Memorandum of Law
Unredacted Statement of Material Facts
Exhibit 5
Exhibit 10
Exhibit 11
Exhibit 12
Exhibit 13
Exhibit 14
Exhibit 15
Exhibit 16
Exhibit 17
Exhibit 18

cc: Counsel of Record (via ECF and email)